LAMBORGHINI

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August 23, 2002 LAMBO #635

Docket Section National Highway Traffic Safety Administration 400 Seventh Street, SW Washington, D.C. 20590

Re: 49 CFR Part 541 Theft Prevention - Docket No. NHTSA-2002-12231 - NPRM (RIN 2127-AI46)

Gentlemen:

On behalf of Automobili Lamborghini, S.p.A.(Lamborghini), I would like to submit the following Comments on the Notice of Proposed Rule Making published in the Federal Register Vol.67, No.123 of June 26, 2002 contained in Docket No. NHTSA-2002-12231 regarding amendments to 49 CFR Part 541 – Federal Motor Vehicle Theft Prevention.

COMMENTS

Currently, manufacturers' vehicle model lines that can be established as "low-theft lines" by petitioning NHTSA under Part 542, can be exempted from the parts marking requirements of Part 541. Most Small Volume Manufacturers (SVM), like Lamborghini, have used this method to obtain exemptions from the parts marking requirements as their Theft Rates have been Zero or Near Zero for their virtual entire history in the United States. (See attached File of NHTSA published Theft Data; which clearly shows that Lamborghini, Ferrari, Rolls Royce and Bentley each have, for the last 10 years, a Theft Rate of virtually Zero)

Extending the theft prevention standard to ALL passenger cars and MPVs, as proposed in the NPRM, will require these and other SVMs to comply with the standard for the first time.

There are fixed costs associated with parts marking. With SVMs, these fixed costs would be spread over a much smaller number of vehicles.

For most SVMs to implement parts marking as required in Part 541, they would have to revamp their entire assembly process, as currently parts installed during assembly cannot easily be coordinated to the final VIN in most cases. The cost of this, due in large part to the low volumes involved, as well as the continued marking of each vehicle will cost significantly more than the Congressionally Mandated \$ 24.86 limit discussed in the NPRM.

In the case of Lamborghini, our vehicles for the United States are not manufactured consecutively. A vehicle for the United States might be followed by one for Europe, then one for the Middle East, and so forth. If so, then the logistics for the entire production procedure, including deployment of personnel, storage of parts, supply to the assembly line and the assembly process may have to be significantly revised. Note that the costs projected in the Preliminary Regulatory Evaluation of March 2002 (PRE) projects labeling cost of "\$3.14 for material and \$2.89 for labor" per car. These costs "were developed under the assumption of a high efficiency operation with 250,000 or more vehicles produced per year." PRE at p.10). Thus, this analysis, and the cost derived from it, is not applicable to the SVMs. However, the analysis given for the cost to an SVM is only an example, that being the cost of designing the label and the cost of a printer of the label for a total of \$6000 amortized over three years. However, labor costs do not appear to be included in this example and none are provided (PRE p.10), unless of course, the Agency assumes that the costs for applying labels "by hand" will only cost \$2.89 (PRE at p.10), even though labels must be affixed to the interior of the engine, transmission, right front fender, left front fender, hood, right front door, left front door, front bumper, rear bumper, right rear quarter panel and left rear quarter panel in a location that is not likely to result in damage to the label by tools, collision or dealer preparation per Part 541 Section 541.5 (d)(1)(ii)(a)(A) through (C). We believe that such a cost estimate might greatly underestimate the cost of labor to Lamborghini and probably for Ferrari, Rolls Royce, Bentley and other SVMs.

The perception that "at the very end of the assembly line, a quality control person goes around the vehicle and attaches the adhesive labels to the applicable parts of the vehicle" (PRE p.15) would not seem a practicable solution on complex vehicles such as Lamborghini, Ferrari, Rolls Royce, Bentley, etc, given the regulation's requirement that the labels be affixed to the interior of the part in an area not likely to subject the label to destruction during dealer prep, collision or repair. It might also stop the assembly line each time a United States designated vehicle came to that point.

As parts marking the U.S. vehicles on the assembly line might substantially reduce efficiency in production, the proposed regulation most probably will require labeling at another site with supply to the assembly line becoming logistically even more complex and expensive in terms of storage, equipment and personnel for most SVMs.

PRIMARY ISSUE

The Small Volume Manufacturer "definition" of 500 vehicles/yr in 541.3 (c).

BACKGROUND

Defining Small Volume or Low Volume Manufacturers has in the past varied from 1000 vehicles/yr in the AALA to Part 555 with 10000 vehicles/yr to qualify and a limit of 2500 vehicles/yr allowed to be sold under any decision granted under Part 555.

Through comment and rulemaking, this has evolved over the years to reach the most current compromise of 5000 vehicles/yr.

POINTS

- Small Volume Manufacturers or Low Volume Manufacturers (SVMs) have recently been defined as 5000 vehicles/yr in FMVSS 208 regulation S.14.1(d) and in the Preamble to the Final Rule in response to petitions for reconsideration of the FMVSS (208) set forth at Fed. Reg. 65400-65401 issued December 18, 2001 and in the new regulation governing Tire Pressure Monitoring Systems at FMVSS 138 S7.6 issued June 5, 2002.
- The Agency has traditionally tried to harmonize definitions that overlap different Standards and Parts.
- Part 541, if it continues to use 500 vehicles/yr as the SVM definition, will be taking a significant step backward from this harmonization position.
- EPA uses a definition of 15000 vehicles/yr for qualification as an SVM with a subcatagory of 5000 vehicles/yr for the maximum exemption benefits. [40 CFR Part 86.1845-04(b)(3) and Table S04-06]
- Therefore, use of a SVM definition of 5000 vehicles/yr seems to be a much more consistent and logical approach that not only harmonizes with other most current FMVSS, but also across agency boundaries.
- SVMs need to have a consistent definition in order to plan for proper compliance both now and in the future. Matters become extremely complex if an SVM is small in one place and large in another particularly within the same agency and the same Part (i.e., 571).
- As far as theft risk is concerned, vehicles generally produced by SVMs are luxury vehicles such as high performance sports cars (i.e., Lamborghini and Ferrari) or luxury sedans (i.e., Rolls Royce, Bentley). Most of these vehicles are not used daily. Often the

annual vehicle miles traveled are extremely low. Owners of such expensive vehicles do not have any reasons to buy replacement parts from someone who is not an authorized dealer for the original manufacturer. On the contrary, any use of "suspicious" replacement parts could seriously detract from the vehicles' resale value. As previously mentioned, the attached File of NHTSA published Theft Data clearly shows that Lamborghini, Ferrari, Rolls Royce and Bentley each have for the last 10 years a Theft Rate of virtually Zero.

- The PRE also notes that a 2% reduction in theft rate would be a benefit. We believe that manufacturers of 5000 or fewer vehicles can neither contribute to nor detract from that benefit, given, for example that Lamborghini has had only one reported theft during the period 1990 through 2000, based on the theft data published in the Federal Register. Indeed, even if the threshold were increased to 5000 vehicles, the goal of the proposed standard would neither be enhanced nor diminished, as our review of the attached tables, published in the Federal Register, reveals that even the vast majority of model lines having fewer than 5000 units have NO thefts. Where thefts do occur, they are typically 2, 3 or 4 per annum and this is on a model line, not a manufacturer, basis. Therefore, we feel an increase in the exempted limit from 500 vehicles per manufacturer to 5000 vehicles per manufacturer will certainly not cause any change in that overall 2 % benefit threshold.

For LAMBORGHINI, while today we are under 500 vehicles/yr - the launch of a new, higher volume model next fall will take us well above this level to 1200 - 1500 vehicles /yr. Having to comply with Part 541 as a large volume manufacturer might cost Lamborghini much more than the \$ 24.86 (as adjusted to 2000 calendar year Dollars) limit established in the 1984 Theft Act.

Ferrari, Rolls Royce and Bentley each are already selling vehicles in the United States at well over the proposed 500 vehicles/yr limit.

CONCLUSION

In light of all the points presented above, Automobili Lamborghini, S.p.A. respectfully requests that NHTSA change the proposed "...manufacturers fewer than 500 vehicles..." limit contained in 49 CFR Part 541 Section 541.3(c) to "...manufacturers fewer than 5000 vehicles...".

Very truly yours,

Michael J. Grossman Designated Agent LAMBORGHINI 186. Jaguar

187. Chrysier Corp

188 Subaru

189. Honda/Acura

190. Toyota

191. Saab

192. Ford Mator Co

193. General Motors

194. Volvo

195. Mitsubishi

196. Subaru

197. Nissan

198. Daihatsu

199. Toyota

200. Nissan

201. Toyota

202. General Motors

203. Mazda

204. Audi

205. Volkswagen

206. General Motors

207. Peugeot

208. Audi

209. Subaru

210. General Motors

211. General Motors

212. Nissan

213. Chrysler Corp

214. General Motors

215. Saab

216. General Motors

217. Yugo

218. Peugeot

219. Lotus

220. Ferrari

221. Lotus

222. Nissan

223. Ferrari

224. Aston Martin

225. Lamborghini

226. Ferrari

227. Rolls-Royce

228. Rolls-Royce

229. Rolls-Royce

230. Maserati

231. Maserati

TABLE 1.—MODEL YEARS 1990/1991 THEFT RATES FOR MOTOR VEHICLES PRODUCED IN CALENDAR YEARS 1990/1991-

Manufacturer	Make/model (line)	1990	1991	(mfgr's) 1990	(mfgr's) 1991	thefts per 1,000 cars produced)
169. General Motors	Buick Regal	148	274	53,561	126,701	2.3410
170. Chrysler Corp	Plymouth Colt/Colt Vista	26	50	12,183	20,681	2.3126
171. Ford Motor Co	Ford Taurus	716	635	309,211	278,485	2.2988
172. Volkswagen		42	36	17,426	16,567	-2.2946
173. General Motors	GMC Safari	-88	99	43,263	38,453	2.2884
174. Ford Mator Co	Ranger Pickup	566	599	271,160	243,697	2.2628
175. Ford Mator Co	Explorer	0	711	0	323,551	2.1975
176. Chrysler Corp		23	58	13,743	23,813	2.1568
177. Nissan	Infiniti Q45	20	40	11,615	16,264	2.1522
178. General Motors	Buick Electra Park Avenue	184	131	46,360	100,702	2.1420
179. Volkswagen	Fox	58	15	24,714	10,425	2.0775
180. Volvo	240	80	45	35,580	25,561	2.0445
181. Volvo	940	0	29	0	14,249	2.0352
182. Ford Motor Co	F150 Pickup Truck	298	215	138,657	114,669	2.0251
183. Audi	80/90	24	1	9,168	3,224	2.0174
184. Tcyota		32	43	19,561	17,643	2.0159
185. Ford Motor Co	Mercury Capri	0	70	0	35,407	1.9770

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154

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279

XJ6

Dodge Dakota Pickup

Legacy

NSX

Lexus LS400

900

Aerostar

Oldsmobile Cutlass Cruiser

760

Precis

Loyale

Pulsar NX

Charade

Land Cruiser

Infiniti G20

Previa

Buick Riviera

MPV Wagon

100/200

Vanagon

Saturn SL

405

V8 Quattro Sedan

Justy

Chevrolet Sportvan G-10

Buick Roadmaster

NX Coupe

Dodge Ram Pickup

Saturn SC

9000

GMC Rally Sportvan

GV/GVL/GVX/GVS

505

Esprit

348

Elan

Van

Mondial

Saloon/Vantage/Volante

Diablo

F40

SIL Spirit/Spur/Mulsa/Eight

Comiche/Continental

Turbo R

Spyder

430/228

Manufacturer	Make/model (line)	Thefts 1990	Thefts 1991	Production (mfgr's) 1990	Production (mfgr's) 1991	Theft rate (1990/91 thefts per 1,000 cars produced)
100 0 111						

Continued					
del (line)	Thefts	Thefts	Production (mfgr's)	Production (mfgr's)	Theft (1990 thefts

15,172

66,459

88.873

42,227

14.574

8.891

9.515

3,210

1.168

32,994

12,447

21,982

47.852

10.869

7,363

700

2.911

9,552

6,715

42,251

20,675

3,092

1,323

102

377

292

98

0

90

399

162

340

31

31

0

1,921

169.574

8.995

71,490

64,200

3,139

41,559

15,437

7,163

8,000

3.732

16,132

81.426

12.956

47,107

9.036

4,729

2,557

8.999

5,804

6,729

8,705

21,763

10,298

24.195

1.620

8,250

654

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240

159

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39,867

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25,904

150,579

1.9448

1.9282

1.9272

1.9114

1.8977

1.8327

1.8179

1.8064

1.7867

1.7841

1.7658

1.7123

1.6688

1.5617

1.5497

1.5474

1.5456

1.4638

1.3564

1.2405

1.2291

1.2281

1.1584

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LAMBORGHINI

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CHRYSLER CORP

ASTON MARTIN

TA	BLE I. THEFT RATES OF MODE	YEAR 1992 PASSENGER MOTOR YEAR 1992—Continued	VEHICLES	STOLEN IN CALENDAR	
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	TEMIT 1332—Softlinded								
	MANUFACTURER	MAKE/MODEL (LINE)	THEFTS 1992	PRODUC- TION · (MFGR'S) 1992	THEFT RATE (1992 THEFTS PER 1,000 VEHICLES PRO- DUCED)				
196 197 198 199 200 201 202	ISUZU FORD MOTOR CO CHRYSLER CORP ISUZU CHRYSLER CORP VOLVO SUBARU	STYLUS	3 10 10 2 4	11,299 61,064 83,090 22,275 50,618 17,750	0.2655 0.1638 0.1204 0.0898 0.0790 0.0000				

	MANUFACTURER	MAKE/MODEL (LINE)	THEFTS 1992	TION · (MFGR'S) 1992	PER 1,000 VEHICLES PRO- DUCED)
196	ISUZU	IMPULSE	3	11,299	0.2655
197	FORD MOTOR CO	E150 VAN	10	61.064	
198	CHRYSLER CORP	DODGE RAM PICKUP	10	- , ,	0.1638
199	ISUZU	STYLUS	10	83,090	0.1204
200	CHRYSLER CORP	DODGE BANAWAGONAVAN BASS	2	22,275	0.0898
201	VOLVO	DODGE RAM WAGON/VAN B150	4	50,618	0.0790
	VOLVO	940	0	17,750	0.0000
202	SUBARU	JUSTY	0	1,213	0.0000
	ROLLS-ROYCE	TURBO R	ň	37	0.0000
204	ROLLS-ROYCE	SIL SPIRIT/SPUR/MULS/FIGHT	0 1	31	0.0000

					DUCED)
196 197 198 199 200 201 202 203 204	CHRYSLER CORP CHRYSLER CORP VOLVO SUBARU ROLLS-ROYCE	IMPULSE	10 10	11,299 61,064 83,090 22,275 50,618 17,750 1,213 37	0.265 0.163 0.120 0.089 0.079 0.000 0.000
205		SIL SPIRIT/SPUR/MULS/EIGHT CORNICHE/CONTINENTAL	0	44	0.000
206	PEUGEOT	405	0	15 218	0.0000
207	PEUGEOT	505	0 1	204	0.0000

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DIABLO

TESTAROSSA

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DODGE VIPER

SALOON/VANTAGE/VOLANTE

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197	FORD MOTOR CO	E150 VAN		,	0.200.
			10	61.064	0.1638
198	CHRYSLER CORP	DODGE RAM PICKUP	10	83.090	
199			10	03,090	0.120
000			2	22.275	0.0898
200	CHRYSLER CORP	DODGE RAM WAGON/VAN B150	1	E0 610	
201			4	50,618	0.0790
			0	17,750	0.0000
202	SUBARU	JUSTY	0	1,	
203	ROLLS-ROYCE	TUDDO	U	1,213	0.0000
		TURBO R	0	37	0.0000
204	ROLLS-ROYCE	SIL SPIRIT/SPUR/MULS/EIGHT	0	1 44 1	
	ROLLS-ROYCE		0	44	0.0000
200	HOLLS-HOTCE	I COHNICHE/CONTINENTAL I	0	1 15	0.000

0.9856

0.9651

0.8196

0.8141

0.7716

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40.584

38.339

51,244

143,724

36,289

6,494

6.764

165,754

436.016

94.655

4.071

13,349

13.821

509

910

70

91

24

99

13

113

14

145

99

36

302

200

18,857

2,946

THEFT RATES OF MODEL YEAR 1993 PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR

Т	THEFT RATES OF MODEL YEAR 1993 PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR YEAR 1993—Continued								
	Manufacturer	Make/model (line)	Thefts 1993	Production (Mfr's) 1993	1993 (per 1,000 vehi- cles pro- duced) theft rate				
171	GENERAL MOTORS	BUICK RIVIERA	7	4,437	1.5776				
172	NISSAN	QUEST	39	25,190	1.5482				
173	AUDI	90	13	8,501	1.5292				
174	FORD MOTOR CO	AEROSTAR	377	248,494	1.5171				
175	SAAB	900	15	9,943	1.5086				
176	JAGUAR	XJ6	12	8,003	1.4994				
177	CHRYSLER CORP	DODGE COLT/COLT VISTA	55	38,339	1.4346				
178	GENERAL MOTORS	OLDSMOBILE CUTLASS CRUISER	9	6,330	1.4218				
179	MERCEDES-BENZ	124	35	25,290	1.3839				
180	VOLVO	240	20	14,985	1.3347				
181	AUDI	\$4	1	756	1.3228				
182	GENERAL MOTORS	OLDSMOBILE 88 ROYALE	73	58,942	1.2385				
183	GENERAL MOTORS	CADILLAC FLEETWOOD	32	26,899	1.1896				
100	GENERAL MOTORO	0000	10	9.745	1.0262				

9000

IMPREZA

PLYMOUTH COLT/COLT VISTA

BUICK PARK AVENUE

BUICK LESABRE

BUICK ROADMASTER

JETTA

100

SATURN SL

OLDSMOBILE 98/TOURING

GOLF/GTI

F150 PICKUP TRUCK

MERCURY VILLAGER (MPV)

JUSTY

DODGE RAM PICKUP D150

SATURN SW

SPIDER

DODGE VIPER

348

512

MONDIAL

XJRS

SEPHIA

DIABLO

ESPIRIT

405

CORNICHE/CONTINENTAL

SIL SPIRIT/SPUR/MULS/EIGHT

TURBOR R

SVX

SAAB

SUBARU

CHRYSLER CORP

GENERAL MOTORS

GENERAL MOTORS

GENERAL MOTORS

VOLKSWAGEN

AUDI

GENERAL MOTORS

GENERAL MOTORS

VOLKSWAGEN

FORD MOTOR CO

FORD MOTOR CO

SUBARU

CHRYSLER CORP

GENERAL MOTORS

ALFA ROMEO

CHRYSLER CORP

FERRARI

FERRARI

FERRARI

JAGUAR

KIA MOTORS

LAMBORGHINI

LOTUS

PEUGEOT

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

SUBARU

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202 Alfa Romeo

THEFT RATES OF MODEL YEAR 1994 PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR YEAR 1994—Continued

Manufacturer	Make/model (line)	Thefts 1994	Produc- tion (Mfgr's) 1994	1994 (pe 1,000 ve hicles pro- duced) theft rate
CO Vallega and	Golf III/GTI	19	12,394	1.533
60 Volksqagen	100	7	4,691	1.492
61 Audi	Concorde	100	70,394	1.420
62 Chrysler Corp	Oldsmobile 88 Royale	104	74,702	1.392
63 General Motors	202 (C-Class)	24	17,379	1.381
64 Mercedes-Benz	Cadillac Eldorado	33	23,918	1.379
5 General Motors		57	41,712	1.366
66 General Motors	Cadillac Seville	4	2,943	1.359
67 Aidi	90	12	9.067	1.323
88 Subaru	Impreza	7	5,334	1.31
9 SAAB	9000	102	78,549	1.29
70 General Motors	Buick Regal	35	26,982	1.29
71 Chrysler Corp	Eagle Summit			1.25
72 Chrysler Corp	Eagle Vision	28	21,999	
73 SAAB	900	16	12,734	1.25
'4 Ford Motor Co	Ranger Pickup	512	418,737	1.22
75 General Motors	GMC Sonoma	117	97,411	1.20
76 General Motors	GMC Sierra 1500 Pickup	185	159,649	1.15
77 General Motors	Oldsmobile 98/Touring	28	24,909	1.12
78 General Motors	Buick Lesabre	148	149,211	0.99
79 Subaru	Loyale	3	3,430	0.87
30 General Motors	Saturn SW	14	16,415	0.85
81 Chrysler Corp	Dodge Viper	2	2,365	0.84
82 Subaru	Justy	2	2,391	0.83
33 General Motors	Buick Roadmaster	28	34,970	0.80
84 General Motors	Buick Park Avenue	48	61,194	0.78
35 Jaguar	XJ6	1	1,452	0.68
86 Ford Motor Co	E150 Van	51	76,347	0.66
37 Ford Motor Co	Mercury Villager (MPV)	36	54,094	0.66
38 Chrysler Corp	Dodge Colt/Colt Vista	16	26,083	0.61
39 Chrysler Corp	Plymouth Colt/Colt Vista	11	18,172	0.60
90 Ford Motor Co	F150 Pickup Truck	237	437,219	0.54
91 Alfa Romeo	Spider	0	187	0.00
92 Lotus	Espirit	0	211	0.00
93 Ferrari	348	0	430	0.00
94 General Motors	GMC Rally Sportuan	0	726	0.00
95 Lamborghini	Diablo	0	66	0.00
96 Rolls-Royce	Turbo R	0	31	0.00
97 Rolls-Royce	Corniche/Continental	0	80	0.00
98 Rolls-Royce	Sil Spirit/Spur/Muls/Eight	0	108	0.00
99 Rolls-Royce			58	0.00
99 Rolls-Royce			17	0.00
100 Addi			15	0.00
201 Volkswagen	164	0	362	1

THEFT RATES OF MODEL YEAR 1995 PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR YEAR 1995—Continued

		Continued			
	Manufacturer	Make/model (line)	Thefts 1995	Production (MFGR'S) 1995	1995 (per 1,000 vehicles produced) theft rate
136			17	8,865	1.9177
137 138	VOLKSWAGENGENERAL MOTORS	PASSAT	30	15,712	1.9094
139	TOYOTA		46	24,488	1.8785
140	GENERAL MOTORS	T100 PICKUP TRUCK	66	35,352	1.8669
141	VOLVO	SATURN SC	111	59,912	1.8527
142	MERCEDES BENZ	124 (E-CLASS)	108	58,537	1.8450
143	GENERAL MOTORS	CHEVROLET BLAZER S-10	58 405	31,583	1.8364
144	GENERAL MOTORS	PONTIAC SUNFIRE	97	221,093 53,129	1.8318 1.8257
145	GENERAL MOTORS	GMC SONOMA TRUCK	108	59,435	1.8171
146 147	FORD MOTOR CO.	EXPLORER	468	260,844	1.7942
148	GENERAL MOTORS	SATURN SL	362	208,457	1.7366
149	NISSAN	BUICK REGAL	155	90,290	1.7167
150	FORD MOTOR CO.	QUEST	111	65,072	1.7058
151	TOYOTA	MERCURY GRAND MARQUIS	161	94,519	1.7034
152	FORD MOTOR CO	CROWN VICTORIA	100	60,370	1.6565
153	FORD MOTOR CO	AEROSTAR	106	64,247	1.6499
154	FORD MOTOR CO.	WINDSTAR	181 523	109,873	1.6474
155	MERCEDES BENZ	202 (C—CLASS)	55	321,744 34,068	1.6255
156	GENERAL MOTORS	GMC JIMMY S-15	112	71,652	1.6144 1.5631
157	TOYOTA	PREVIA	31	20,905	1.4829
158 159	JAGUAR	XJS	8	5,441	1.4703
160	GENERAL MOTORS	CHEVHOLET LUMINA	477	337,623	1.4128
161	SAAB	RANGER PICKUP	310	220,493	1.4059
162	SUBARU	900	34	24,332	1.3973
163	JAGUAR	LEGACY	106	78,271	1.3543
164	SUZUKI	SWIFT	1	750	1.3333
165	ISUZU	TROOPER	7	5,330	1.3133
166	MAZDA	B SERIES PICKUP	31 37	24,647	1.2578
167	SAAB	9000	9	29,848 7,338	1.2396
168	VOLVO	940	15	12,238	1.2265 1.2257
169	BMW	7	22	17,960	1.2249
170 171	GENERAL MOTORS	CADILLAC SEVILLE	42	35,789	1.1735
172	GENERAL MOTORS	OLDSMOBILE AURORA	52	45,677	1.1384
173	GENERAL MOTORS	BUICK RIVIERA	45	39,626	1.1356
174	AUDI	CARRIOLET	16	14,839	1.0782
175	FORD MOTOR CO	CABRIOLET	1	950	1.0526
176	GENERAL MOTORS	SATURN SW	81	87,745	0.9231
177	CHRYSLER CORP	CONCORDE	16 46	17,900	0.8939
178	GENERAL MOTORS	BUICK LESABRE	144	51,524 163,726	0.8928
179	GENERAL MOTORS	OLDSMOBILE 88 ROYALE	59	70,346	0.8795 0.8387
180	SUBARU	SVX	1	1,228	0.8143
181 182	VOLVO	960	11	14,228	0.7731
183	GENERAL MOTORS	90	3	4,475	0.6704
184	AUDI	BUICK PARK AVENUE	36	60,667	0.5934
185	GENERAL MOTORS	A6	5	8,492	0.5888
186	GENERAL MOTORS	OLDSMOBILE 98/TOURINGBUICK ROADMASTER	13	24,161	0.5381
187	HONDA	ODYSSEY	15	28,375	0.5286
188	SUZUKI	ESTEEM	15	32,065	0.4678
189	GENERAL MOTORS	GMC G15/25/35 VANDURA	4	4,466	0.4478
190	GENERAL MOTORS	CHEVROLET G10/20/30 VAN/SPORTVAN	12	31,897 102,383	0.1254
191	AUDI	S6	0	2,377	0.1172 0.0000
192	FIAT	ALFA ROMEO 164	o l	361	0.0000
193	FIAT	FERRARI 348	0	181	0.0000
194 195	FIAT	FERRARI 456	0	155	0.0000
196	FIAT	FERRARI 512	0	76	0.0000
197	GENERAL MOTORS	FERRARI F50	0	56	0.0000
198	GENERAL MOTORS	BUICK COACHBUILDER	0	98	0.0000
199	LAMBORGHINI	DIABLO	0	1,650	0.0000
200	LOTUS	ESPIRIT	0	285	0.0000
201	PORSCHE	928	0	241 77	0.0000
202	ROLLS-ROYCE	BROOKLANDS	ő	25	0.0000
			0 1	201	0.000

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	Manufacturer	Make/model (line)	Thefts 1996	Production (Mfr's) 1996	1996 (per 1,000 vehi- cles pro- duced) theft rate
156	FORD MOTOR CO	MERCURY GRAND MARQUIS	136	95.020	1.4313
157	SUZUKI	X-90	7	4,907	1.4265
158	GENERAL MOTORS	GMC SAFARI VAN	32	22,540	1.4197
159	CHRYSLER CORP	CONCORDE	71	50,123	1.4165
160	GENERAL MOTORS	CADILLAC SEVILLE	46	33,641	1.3674
161	VOLKSWAGEN	PASSAT	. 25	18,770	1.3319
162	GENERAL MOTORS	SATURN SL	273	210,472	1.2971
163	JAGUAR	VANDEN PLAS	6	4,688	
164	FORD MOTOR CO	AEROSTAR VAN	75		1.2799
165	NISSAN	QUEST		59,468	1.2612
166	GENERAL MOTORS	BUICK RIVIERA	56	45,543	1.2296
167	GENERAL MOTORS	BUICK PARK AVENUE	20	17,389	1.1502
168	MAZDA	MPV	53	47,008	1.1275
169	VOLVO	960	16	14,595	1.0963
170	CHRYSLER CORP	TOWN & COUNTRY MPV	20	18,266	1.0949
171	KIA MOTORS	SDODTAGE	113	105,993	1.0661
172	SUBARU	SPORTAGE	9	8,638	1.0419
173	ISUZU	LEGACY	82	79,809	1.0275
174	ISUZU	HOMBRE PICKUP TRUCK	13	12,993	1.0005
175	FORD MOTOR CO.	OASIS	4	4,001	0.9998
176	GENERAL MOTORS	MERCURY VILLAGER MPV	53	57,403	0.9233
177	FORD MOTOR CO.	OLDSMOBILE AURORA	20	22,349	0.8949
178	CHRYSLER CORP.	CROWN VICTORIA	95	108,250	0.8776
179	CLIDADII	CARAVAN¹	1	1,140	0.8772
	SUBARU	IMPREZA	14	16,337	0.8570
127	GENERAL MOTORS	SATURN SW	14	16,539	0.8465
181 182	SAAB	SAAB 900	19	22,516	0.8438
	GENERAL MOTORS	CADILLAC FLEETWOOD	7	8,346	0.8387
	GENERAL MOTORS	BUICK FUNERAL COACH/HEARSE	1	1,457	0.6863
184	GENERAL MOTORS	BUICK LESABRE	33	52,129	0.6330
185	BMW	Z3	6	11,542	0.5198
186	GENERAL MOTORS	BUICK ROADMASTER	11	21,495	0.5138
187	HONDA	ODYSSEY	8	19,266	0.4152
188	GENERAL MOTORS	OLDSMOBILE NINETY-EIGHT	5	14,383	
189	AUDI	A6	3	9,269	0.3476
190	FIAT	FERRARI F355	ő	286	0.3237
191	GENERAL MOTORS	GMC C1500 SIERRA PICKUP	0		0.0000
192	GENERAL MOTORS	GMC G1500/2500 SAVANA VAN	0	5,912	0.0000
193	GENERAL MOTORS	CHEVROLET G1500/2500 CHEVY VAN	_	2,113	0.0000
194	GENERAL MOTORS	CHEVROLET C1500 PICKUP	0	9,271	0.000
195	GENERAL MOTORS	CADILLAC LIMOUSINE	0	14,441	0.0000
196	JAGUAR	XJR	0	1,598	0.0000
197	LAMBORGHINI	/WII ***********************************	0	506	0.0000

DB132/DIABLO

PICKUP TRUCK

BENTLEY CONTINENTAL R

BENTLEY BROOKLANDS

BENTLEY AZURE

BENTLEY TURBO R/TURBO RL

SVX

725

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87

84

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LAMBORGHINI

MITSUBISHI

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

SUBARU

VECTOR AEROMOTIVE

AVTECH SC/M12 ¹ Special production of vehicles for sale only in Puerto Rico under the Chrysler nameplate.

1997 theft rate

(per 1,000

vehicles

produced)

0.6242

0.5950

0.5734

0.5304

0.5027 0.4702 0.3207 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000

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Production

(Mfr's) 1997

1.602

73,948

20,927

40

54

21

113

187

Thefts 1997

44

12

0

0

Make/model (line)

OASIS

OLDSMOBILE SILHOUETTE VAN

Manufacturer

ISUZU

HONDA

GENERAL MOTORS

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

TOYOTA

VECTOR AUTO

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THEFT RATES OF MODEL YEAR 1997 PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR YEAR 1997—Continued

180	GENERAL MOTORS	OLDGIVIODILL GILLIOULT IL VAN		,	
181	GENERAL MOTORS	CHEVROLET VENTURE VAN	38	71,649	
182	GENERAL MOTORS	BUICK CENTURY	27	53,706	
183	GENERAL MOTORS		28	59,549	ļ
184	GENERAL MOTORS		7	21,828	
185	AUDI	l	0	1,201	ļ
186	CHRYSLER CORP		0	1,537	
187	FERRARI	F355	0	622	
188	FERRARI	456	0	70	
189	FERRARI	550	0	94	
190	GENERAL MOTORS	BUICK FUNERAL COACH/HEARSE	0	546	
191	GENERAL MOTORS	CADILLAC LIMOUSINE	0	445	
192	GENERAL MOTORS	SATURN EV1	0	2,000	
193	HONDA	ACURA NSX	0	322	
194	JAGUAR	VANDEN PLAS		2,536	
195	LAMBORGHINI	DB132/DIABLO	0	74	
196	LOTUS	ESPRIT	0	121	
197	ROLLS-ROYCE	BENTLEY AZURE	0	81	
198	BOLLS-BOYCE			135	1

BENTLEY CONTINENTAL T

BENTLEY TURBO R

SILVER DAWN

SILVER SPUR

PARK WARD LIMOUSINE

LEXUS GS

AVTECH SC/M12

¹These vehicles were manufactured for sale only in U.S. territories under the Chrysler nameplate.

FOR FURTHER INFORMATION CONTACT: Ms. Rosalind Proctor, Office of Planning and Consumer Programs, NHTSA, 400 Seventh Street, SW., Washington, DC 20590. Ms. Proctor's telephone number is (202) 366–0846. Her fax number is (202) 493–2290. SUPPLEMENTARY INFORMATION: NHTSA administers a program for reducing motor vehicle theft. The central feature of this program is the Federal Motor Vehicle Theft Prevention Standard, 49 CFR Part 541. The standard specifies performance requirements for inscribing and affixing vehicle identification numbers (VINs) onto certain major	compared to the theft rate experienced in CY/MY 1997. The final theft rate for MY 1998 passenger vehicles stolen in CY 1998 decreased to 2.53 thefts per thousand vehicles produced, a decrease of 17.05 percent from the rate of 3.05 thefts per thousand vehicles experienced by MY 1997 vehicles in CY 1997. For MY 1998 vehicles, out of a total of 196 vehicle lines, 41 lines had a theft rate higher than 3.5826 per thousand vehicles, the established median theft rate for MYs 1990/1991.	listed by the age were not in erro production voluthe Chevrolet M Tracker vehicle unchanged. The following NHTSA's final of for all 1998 passines. This list is public of calend vehicle thefts of vehicles and do the obligations of under 49 U.S.C. Prevention.	ency for the tyr. Therefore, ame and the titetro and Che lines will rended to senger motor intended to lar year 1998 model year 1 es not have a of regulated p Chapter 331,	wo lines the heft rate for vrolet nain ts theft rates vehicle inform the motor 1998 ny effect on arties Theft
Manufacturer	Make/model (line)	Thefts 1998	Production (mfr's) 1998	1998 theft rate (per 1,000 vehi- cles pro- duced)
1 MITSUBISHI 2 LAMBORGHINI			6,584 104	13.2139 9.6154

0.5245

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38,130

50,425

3.655

445

119

259

993

243

702

162

121

70

23

299

51

PRELIMINARY REPORT OF THEFT RATES OF 1999 MODEL YEAR PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR YEAR 1999—Continued 1999 theft

No.	Manufacturer	Make/model (line)	Thefts 1999	Production (Mfr's) 1999	rate (per 1,000 vehi- cles pro- duced)
178	JAGUAR HONDA	VANDENPLASCR-VSIENNAVAN	3 72 43	4,435 110,945 69,531	0.6764 0.6490 0.6184

INO.	iviariulacturei	Wake/Hodel (ille)	mono rece	(Mtr's) 1999	cles pro- duced)
179	JAGUAR	VANDENPLAS	3 72 43 10	4,435 110,945 69,531 16,420	0.6764 0.6490 0.6184 0.6090
	IACHAR	X.IR	1 1	1,778	0.5624

					duceu)
178		CR-V	3 72	4,435 110,945	0.6764 0.6490 0.6184
179	TOYOTAGENERAL MOTORS	SIENNAVAN	43 10	69,531 16.420	0.6090
180 181		XJR	1	1,778	0.5624
		BOXSTERCONVERTIBLE	7	13,234	0.5289

GENERAL MOTORS

HONDA

DAIMLERCHRYSLER

FERRARI

FERRARI

FERRARI

GENERAL MOTORS

HONDA

LAMBORGHINI

LOTUS

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

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185

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201

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

ROLLS-ROYCE

OLDSMOBILESILHOUETTE VAN

ODYSSEYVAN

PLYMOUTHPROWLER

360

BUICKFUNERAL COACH

ACURANSX

DB132/DIABLO

ESPRIT

BENTLEYAZURE

BENTLEYCONTINENTAL R

BENTLEYCONTINENTAL SC

BENTI EYCONTINENTAL T

BENTLEYTURBO R

SILVERSERAPH

SILVERSPUR

SII VERSPUR PARK WARD

PRELIMINARY REPORT OF THEFT RATES FOR 2000 MODEL YEAR PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR YEAR 2000—Continued

No.	Manufacturer	Make/model (line)	Thefts 2000	Production (Mfr's) 2000	2000 theft rate (per 1,000 vehi- cles produced)
135	PORSCHE	911	11	7,578	1,4516
136	GENERAL MOTORS	GMC SONOMA PICKUP TRUCK	86	60,124	1.4304
137	JAGUAR	XJ8	10	7,086	1.4112
138	VOLKSWAGEN	GOLF/GTI	37	26,862	1.3774
139	AUDI	A8	3	2,189	1.3705
140	MERCEDES BENZ TOYOTA	210 (E-CLASS)	64 15	46,709	1.3702 1.3418
141	DAIMLERCHRYSLER	DODGE VIPER	2	11,179 1,559	1.2829
143	GENERAL MOTORS	SATURN LS	105	82,956	1.2657
144	TOYOTA	LEXUS RX	113	89,410	1.2638
145	GENERAL MOTORS	BUICK LESABRE	240	190,269	1.2614
146	FORD MOTOR CO	FORD WINDSTAR VAN	291	232,403	1.2521
147	AUDI	A4	24	19,304	1.2433
148	VOLVO	S80	44	35,864	1.2269
149	SUBARU	IMPREZA	21	17,353	1.2102
150	GENERAL MOTORS	PONTIAC MONTANA VAN	75	62,640	1.1973
151 152	MERCEDES BENZ TOYOTA	170 (SLK-CLASS)	7 54	5,891 45,885	1.1883 1.1769
153	DAIMLERCHRYSLER	PLYMOUTH PROWLER	3	2,576	1.1646
154	GENERAL MOTORS	BUICK PARK AVENUE	59	51,365	1.1486
155	VOLKSWAGEN	CABRIO	10	8,836	1.1317
156	NISSAN	INFINITI 130	45	39,815	1.1302
157	JAGUAR	VANDEN PLAS	4	3,596	1.1123
158	NISSAN	QUEST	52	46,834	1.1103
159	HONDA	ACURA TL	74	67,287	1.0998
160	GENERAL MOTORS	CADILLAC CATERA	17	15,629	1.0877
161	GENERAL MOTORS	CHEVROLET VENTURE VAN	107	100,041	1.0696
162 163	HONDA	CR-V	121 11	114,387 10,527	1.0578 1.0449
164	HONDA	ACURA RL	17	16,470	1.0322
165	MERCEDES BENZ	129 (SL-CLASS)	5	4,845	1.0320
166	SUBARU	FORESTER	29	28,950	1.0017
167	DAIMLERCHRYSLER	CHRYSLER TOWN & COUNTRY	93	96,298	0.9658
168	ISUZU	AMIGO	3	3,199	0.9378
169	MAZDA	MPV	47	50,565	0.9295
170	FORD MOTOR CO	MERCURY VILLAGER MPV	29	31,495	0.9208
171	GENERAL MOTORS	CADILLAC FUNERAL COACH	1	1,100	0.9091
172 173	VOLKSWAGEN	AVALON	98 81	108,025	0.9072 0.9018
174	NISSAN	NEW BEETLE	25	89,819 28,258	0.8847
175	VOLKSWAGEN	PASSAT	59	67,216	0.8778
176	GENERAL MOTORS	OLDSMOBILE SILHOUETTE VAN	34	41,705	0.8152
177	SAAB	9–3	14	17,929	0.7809
178	GENERAL MOTORS	SATURN LW	11	14,418	0.7629
179	SAAB	9–5	13	17,162	0.7575
180	TOYOTA	SIENNA VAN	96	131,405	0.7306
181 182	TOYOTA	MR2	4 65	5,597	0.7147
183	JAGUAR	XKR	1	97,215 1,508	. 0.6686 0.6631
184	GENERAL MOTORS	SATURN SW	6	9,113	0.6584
185	PORSCHE	BOXSTER/BOXSTER S	8	13,563	0.5898
186	HONDA	\$2000	5	9,206	0.5431
187	MAZDA	MX-5 MIATA	8	16,107	0.4967
188	FORD MOTOR CO	FORD CROWN VICTORIA	50	103,784	0.4818
189	HONDA	INSIGHT	2	5,603	0.3570
190	HONDA	ODYSSEY	33	122,131	0.2702
191	ASTON MARTIN	VANTAGE VOLANTE	0	573	0.0000
192	BMW	Z8	0	2,936	0.0000
193	DAIMLERCHRYSLER	CHRYSLER STRATUS ²	0	131	0.0000
194	FIAT	FERRARI 360	0	452	0.0000
195 196	FIAT	FERRARI 456	0	82	0.0000
196	LOTUS	FERRARI 550 ESPRIT	0	256 200	0.0000 0.0000
198	ROLLS-ROYCE	BENTLEY ARNAGE	0	422	0.0000
199	ROLLS-ROYCE	BENTLEY AZURE	0	93	0.0000
200	ROLLS-ROYCE	BENTLEY CONTINENTAL R	Ö	23	0.0000
201	ROLLS-ROYCE	BENTLEY CONTINENTAL SC	Ö	3	0.0000
202	ROLLS-ROYCE	BENTLEY CONTINENTAL T	0	2	0.0000
203	ROLLS-ROYCE	BENTLEY CORNICHE	0	97	0.0000

PRELIMINARY REPORT OF THEFT RATES FOR 2000 MODEL YEAR PASSENGER MOTOR VEHICLES STOLEN IN CALENDAR YEAR 2000—Continued

No.	Manufacturer	Make/model (line)	Thefts 2000	Production (Mfr's) 2000	2000 theft rate (per 1,000 vehi- cles produced)
205	TOYOTA	SILVER SERAPHLEXUS SCEUROVAN	0 0 0	154 823 2,791	0.0000 0.0000 0.0000

¹ Nativa is the name applied to Montero Sport vehicles that are manufactured for sale only in Puerto Rico. ² These vehicles were manufactured for sale in the U.S. territories under the Chrysler nameplate.

Issued on: March 4, 2002.

Stephen R. Kratzke,

Associate Administrator for Safety

Performance Standards.

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